

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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STEVEN RAMSEY,)

Plaintiff)

v.)

JAY CASHMAN, INC.)

Defendant)

Civil Action No.:
04-CV-10699-RCL

U.S. DISTRICT COURT
DISTRICT OF MASS.

PROPOSED JOINT STATEMENT

The parties in the above captioned action, by their attorneys, submit the following proposed joint statement pursuant to the provisions of Federal Rule of Civil Procedure 16(b) and Local Rule 16.1. An initial scheduling conference is scheduled for June 17, 2004.

I. Obligation of Counsel to Confer:

Counsel for the parties have conferred in accordance with the provisions of Local Rule 16.1. Counsel agree to explore the possibilities of alternative dispute resolution upon the completion of discovery.

Counsel also certify that they have conferred with their respective clients concerning those matters set forth in Local Rule 16.1 (C) prior to the scheduling conference.

II. Joint Statement:

A. Phase I. Factual Discovery:

For developing information needed for a realistic assessment of the case and to enable the parties to file substantive motions.

1. Factual discovery conducted up to and including, February 21, 2005.

B. Substantive Motions:

1. Motions to Amend to add parties filed as soon as the party can reasonably be expected to have become aware of the identity of the new party.
2. All dispositive and substantive motions to be filed up to and including, February 21, 2005.
3. Motions for Judgment as a Matter of Law filed at any time.

C. Phase 2. Trial Preparation:

For developing information needed to prepare for trial.

1. Plaintiff's designation of expert witnesses and disclosure of information contemplated by Federal Rule of Civil Procedure 26 (b)(4)(A)(i) is to be provided by February 21, 2005.
2. Defendant's designation of expert witnesses and disclosure of information contemplated by Federal Rule of Civil Procedure 26 (b)(4)(A)(i) is to be provided by March 21, 2005.
3. Depositions of experts will not be conducted before February 21, 2005, but will be completed by April 30, 2005.
4. The parties request that a final pre-trial conference be held in April 2005, and that this matter be placed on the Courts running trial list for May 2005.

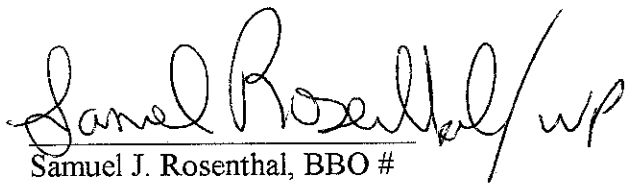
III. Certification of Parties and their Counsel

The parties and their counsel herein certify that they have conferred with a view to establishing a budget for the costs of conducting the full course, and various alternative courses of

this litigation; and they have considered and discussed the resolution of this litigation through the use of alternative dispute resolution programs as outlined in Local Rule 16.4.

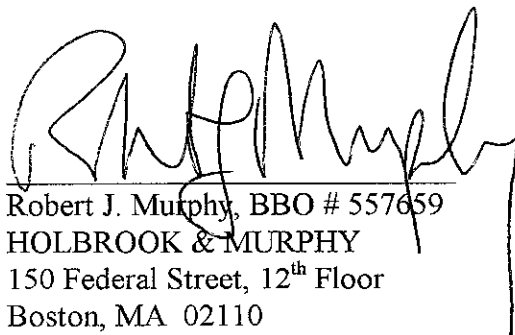
By their attorneys,

Attorneys for the Plaintiff,

A handwritten signature in cursive script, reading "Samuel J. Rosenthal" followed by a stylized flourish.

Samuel J. Rosenthal, BBO #
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200 N. 5th Street
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Attorneys for the Defendant,

A handwritten signature in cursive script, reading "Robert J. Murphy" followed by a long vertical line extending downwards.

Robert J. Murphy, BBO # 557659
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